



THE BIRMINGHAM AIRPORT

July 1, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 - M Street, N. W.
Room 222
Washington, D. C. 20554

Re: Docket Number 92-77

Dear Ms. Searcy:

The purpose of this correspondence is to express the opposition of the Birmingham Airport Authority to the Bill Party Preference (BPP).

Should BPP become a reality, the Birmingham Airport Authority will experience a significant loss of customer convenience and service, not to mention potential decrease in number of public phones, by virtue of which many programs and partnerships between agents and long distance telephone companies, all beneficial to the traveling public, could be eliminated.

With the prime goal of our effort being that which will ensure the public the right to continue to enjoy the privilege of access to public pay phones at reasonable cost, we trust our letter of opposition and the reasoning therefor will be well received and a subsequent positive impact therefrom result upon the decision yet, but soon, to be rendered.

Sincerely,

Al Denson

Al Denson,
Director of Administration

ADg

CC: Messrs. Jim Brough
Joe Leahy

BIRMINGHAM AIRPORT AUTHORITY
5900 AIRPORT HIGHWAY
BIRMINGHAM, ALABAMA 35212
205 595 0533 FAX 205 599 0538

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KEY POINTS WHICH SHOULD BE STATED BY AGENTS & ASSOCIATIONS WHEN WRITING TO THE FCC.

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- Service quality may deteriorate for agents' customers during the implementation of BPP.
- Unblocking 10XXX-0+ codes and the availability of 1-800 or 950 access numbers eliminates the need for BPP. Unblocking accomplishes the same objective without adding confusion for the end user.
- Loss of commission revenue could eliminate many programs and partnerships between agents and long distance telephone companies which are beneficial to the public. In addition, loss of 0+ commission revenues may also impact aggregators ability to provide additional service offerings to the public. For example, voice mail in hotels.
- The initial and ongoing costs of BPP will be millions of dollars. These costs will be passed on to the end user and the end result would be more expensive telecommunication services.
- There is a potential for a reduction in public phones for the public. With the loss of commissions, there will be less "shelf space" for public phones, which will have an adverse affect on the availability of easy access for end users.

Please refer to the AT&T position paper on BPP, included with this document, for additional points which agents and associations should make when writing to the FCC about BPP.

ATTACHMENT III**WHERE AND TO WHOM AT THE FCC SHOULD AGENTS WRITE ABOUT BPP?**

When agents and associations do want to write to the FCC, they should be given the following person's name and address:

**Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554
Docket No. 92-77**

We also have available a tape of the FCC Open Meeting on Billed Party Preference, conducted on April 9, 1992. We are encouraging agents and associations to watch this tape to fully appreciate the FCC's position on BPP.

ATTACHMENT IV

AT&T POSITION ON BILLED PARTY PREFERENCE

Background

Billed Party Preference (BPP) is a proposal that would eliminate long distance carrier assignment based on contractual arrangements for operator assisted interLATA calls. Under this proposal, such calls would be intercepted by the LEC operator system which would determine the 0+ preferred interexchange carrier based on the party paying for the call (e.g., the card holder on a calling card call or the called party on a collect call). Calls would then be routed to the operator system of the designated interexchange carrier for call completion. Access code dialing would still be available to allow consumers to dial around BPP as necessary.

Under BPP, the PIC for the phone would be ignored for calls dialed on a 0+ basis. BPP would result in aggregators having less control over which carrier would handle calls from their locations; IXC's would have less incentive for commission compensation to the 0+ preferred interexchange carrier.

When BPP was initially proposed in 1986 under the name of Carrier Identification Service, AT&T and others were strongly opposed to it for reasons pertaining to costs and the technical and service quality impact of implementing such a plan. Since that time, nothing new has been put on the record to eliminate these earlier concerns.

Proposed FCC Action

On May 8, 1992, the Commission issued a Notice of Proposed Rule Making (NPRM) docket 92-77 that addressed two issues:

- o Billed Party Preference and
- o the use of proprietary cards with 0+ access (referred to by competing operator service providers as "0+ Public Domain").

The Commission tentatively concluded that a nationwide system of BPP might be appropriate and noted that changes in the operator services industry over the last several years have made calling from public phones more confusing to consumers. The Commission believes that BPP would make operator assisted interLATA calling more "user friendly" and focus competition on the end user instead of on the premises owner.

In its NPRM, the Commission is asking for comments (by July 7 with reply comments due August 6) on a variety of issues related to BPP. The focus of the comments, however, is on the benefits and costs of such a system. One of the primary issues on which the Commission has sought comments is the appropriate scope of BPP, that is whether BPP should be confined to pay telephones, extended to include all interLATA aggregator traffic (e.g., phones in hotel, hospital and university rooms), or extended further to include calls from all phones (including residence and business).

BPP Is Inappropriate and Unnecessary

There have been a number of changes in the telecommunications industry that make adoption of BPP inappropriate and unnecessary.

- o The current equal access payphone presubscription plan, which routes calls to the presubscribed carrier of the originating phone, treats all IXC's equally and allows end users an opportunity to reach their preferred carrier. New federal law and regulations requiring the unblocking of 10XXX-0+ access codes and the availability of 1-800 or 950 access numbers have eliminated the need to pursue the implementation of BPP.
- o IXC's and consumers would seek to bypass a BPP system through access code dialing in order to obtain services and features not available through BPP. Such action would further inconvenience customers.
- o Loss of commission revenue to the aggregator would also inhibit customer convenience by eliminating new feature and equipment availability. In order to continue to offer end users these conveniences, aggregators may be forced to supplant the commission payments with new or increased surcharges payable directly by the end users.
- o Guests will lose certain billing options such as commercial credit cards. In addition, visitors from foreign countries would have new problems in placing calls charged to cards issued by foreign telephone companies or placed on a collect basis.
- o The cost of implementing BPP would be in the millions of dollars. End users would bear the brunt of these costs as they are reflected in more expensive telecommunication services.

Requested Action

The FCC should not interfere with competition by imposing a system such as BPP. BPP is a cynical solution being forced on a competitive marketplace where no problem exists. The Commission should give unblocking a chance to work before looking at making changes that impact the marketplace. Customers are aware, through signage and call branding, of the operator services they encounter and, with unblocking, they have the ability to reach their carrier of choice without BPP.